

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF FLORIDA
CASE NO.: 25-cr-60128-WPD

UNITED STATES OF AMERICA,
Plaintiff,

vs.

CHAD ANTHONY CLARK,
Defendant.

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UNOPPOSED MOTION FOR CONTINUANCE OF THE SENTENCING HEARING

COMES NOW the Defendant, Chad Anthony Clark, and files this Motion for Continuance of the Sentencing Hearing, and in support thereof, states:

1. On May 12, 2025, Mr. Clark was arrested in the above-referenced cause. [D.E. 1]
2. On June 5, 2025, a Grand Jury returned an Indictment charging him, and five (5) others as follows: count one (1) Conspiracy to Possess with Intent to Distribute and Distribute a Controlled Substance, in violation of 21 U.S.C. § 846; count eight (8), ten (10) and eleven (11) Distribution of a Controlled Substance, in violation of 21 U.S.C. § 841(a)(1).¹ [D.E. 53]
3. On September 19, 2025, Mr. Clark entered a plea of guilty as to count one (1) of the Indictment. [D.E. 126]
4. On November 5, 2025, the draft disclosure of Mr. Clark's Presentence Investigation Report (PSR) was filed; it calculated Mr. Clark's total offense level to be a 31 and his criminal history category to be a six (6), as a career offender pursuant to § 4B1.1(b), yielding a sentencing guideline range of 188-235 months. [D.E. 149]

¹ Mr. Clark is not charged in counts two (2) through seven (7), nine (9), or twelve (12) and thirteen (13).

5. On November 17, 2025, an Order was entered granting Mr. Clark's Motion to Continue Sentencing Hearing, resetting the sentencing hearing as to Mr. Clark to January 12, 2026, so that undersigned counsel could request records and retain and expert to assist in presenting mitigation to the Court. [D.E. 153 and 154].
6. Undersigned counsel has requested said records and retained the expert; however, one last continuance is being requested as undersigned counsel has not received the records sought and the expert needs additional time to complete her analysis.
7. Mr. Clark is currently housed at FDC Miami, and while we have been able to meet with Mr. Clark, issues with the entry into FDC, and health issues the expert has been presented with, necessitates additional time for the expert to complete her evaluation of Mr. Clark, and provide an opinion.
8. Lastly, undersigned counsel would like additional time to present a Motion for Downward Variance, based on the aforementioned records and evaluation.
9. A continuance would not prejudice Mr. Clark, as he is facing a significant amount of time.
10. This Motion is not made for the purposes of delay and will not cause prejudice or undue burden.
11. Undersigned counsel has conferred with counsel for the United States, who has no objection to a continuation of the sentencing hearing to accommodate undersigned counsel's request.
12. It is respectfully requested that Mr. Clark's Sentencing hearing be continued for, at least, to the week of January 27th through 30th, 2026.

13. It is further respectfully requested that the Sentencing hearing not be set January 14-21, 2026, or February 3-16, 2026, as undersigned counsel has previously scheduled, non-cancelable, non-refundable personal obligations.

Accordingly, the parties respectfully request a continuation of the memorandum deadline and sentencing hearing.

Respectfully submitted,

/s/ Dianne E. Carames
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CERTIFICATE OF SERVICE

I hereby certify that on January 6, 2026, undersigned electronically filed the foregoing document with the Clerk of the Court using CM/ECF which will send notification of such filing the United States Attorney's Office, Southern District of Florida.

/s/ Dianne E. Carames
Dianne E. Carames